

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Case No. 4:22-cv-02224-DMR

**STIPULATION TO EXTEND DEADLINE
TO COMPLETE JOINT SITE
INSPECTION REQUIRED BY GENERAL
ORDER 56; ORDER**

MOUFEEED K. MOHAMED, individually and
dba 3 RINGS WINE & SPIRITS, et al.,

Plaintiff, Gerardo Hernandez (“Plaintiff”), and Defendants, Moufeed Kaid Mohamed, individually and dba 3 Rings Wine & Spirits; and Gamela H. Mosleh; Yunes M. Alghurbani and Yosif Mohamed Musid (“Defendants,” and together with Plaintiff, “the Parties”), by and through their respective counsel, hereby stipulate as follows:

1. This action arises out of Plaintiff's claims that Defendants denied him full and equal access to their public accommodation on account of his disabilities in violation of Title III of the Americans with Disabilities Act ("ADA") and parallel California law. Plaintiff seeks injunctive relief under federal and California law, as well as damages under California law. This matter therefore proceeds under this district's General Order 56 which governs ADA access matters.

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1 2. The Court has ordered that the Parties conduct a joint site inspection of the
2 subject property within 60 days after service of the complaint (General Order 56, as amended in
3 January 2020), in this instance, on or before August 12, 2022.

4 3. The Parties were unable to schedule a date and time, before the August 12, 2022
5 deadline to conduct a joint site inspection due to defense counsel moving to a new office
6 location.

7 4. Nonetheless, the Parties have agreed to conduct the joint site inspection on
8 September 7, 2022 at 1:00 p.m. if the matter does not settle prior to that time, subject to the
9 Parties' reservation to further modify the date if necessary.

10 5. Accordingly, the Parties stipulate to extend the deadline to conduct the joint site
11 inspection to September 7, 2022, with all dates triggered by that deadline continued
12 accordingly.

13 **IT IS SO STIPULATED.**

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15 Dated: August 15, 2022

MOORE LAW FIRM, P.C.

16
17 /s/ Tanya E. Moore

Tanya E. Moore
Attorney for Plaintiff,
Gerardo Hernandez

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19
20 Dated: August 15, 2022

LAW OFFICES OF MATTHEW J. WEBB

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22 /s/ Matthew J. Webb

Matthew J. Webb
Attorney for Defendants,
Moufeed Kaid Mohamed, individually and dba 3
Rings Wine & Spirits; and Gamela H. Mosleh;
Yunes M. Alghurbani and Yosif Mohamed Musid

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STIPULATION TO CONTINUE DEADLINE FOR JOINT SITE
INSPECTION; ORDER

ATTESTATION

Concurrence in the filing of this document has been obtained from each of the individual(s) whose electronic signature is attributed above.

/s/ Tanya E. Moore

Tanya E. Moore

Attorney for Plaintiff,

Gerardo Hernandez

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the deadline for the Parties to complete the joint site inspection is extended to September 7, 2022, with all dates triggered by that deadline continued accordingly.

IT IS SO ORDERED.

Dated: 8/17/2022



United States Magistrate Judge